

Devon Zastrow Newman, OSB #014627

Email: dnewman@schwabe.com

Catherine B. Brinkman, OSB #002134

Email: cbrinkman@schwabe.com

SCHWABE, WILLIAMSON & WYATT, P.C.

1211 SW 5th Ave., Suite 1900

Portland, OR 97204

Telephone: 503-222-9981

Facsimile: 503-796-2900

Paul N. Tauger, *appearing pro hac vice*

Email: pnt@eclipsegrp.com

Anna M. Vradenburgh, *appearing pro hac vice*

Email: amv@eclipsegrp.com

THE ECLIPSE GROUP LLP

2020 Main Street, Suite 600

Irvine, CA 92614

Telephone: 949-851-5000 ext. 110

Facsimile: 949-851-5051

Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company,

Plaintiff,

v.

TENZA TRADING LTD., a Cyprus
Company,

Defendant.

No. 3:13-cv-01045-SI

DEFENDANT AND COUNTERCLAIM
PLAINTIFF TENZA TRADING LTD.'S
NOTICE OF ERRATA REGARDING ITS
MOTION FOR SUMMARY
JUDGMENT/SUMMARY ADJUDICATION
OF ISSUES

TENZA TRADING LTD., a Cyprus
Company,

Counterclaim Plaintiff,

v.

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company; and
ALEXANDER ZHUKOV, A
Czechoslovakian citizen,

Counterclaim Defendants.

Defendant and Counterclaim Plaintiff Tenza Trading Ltd. (“Tenza”) submits this Notice of Errata in order to inform the Court of errors made in filing of its Motion for Summary Judgment/Summary Adjudication of Issues (Dkt. No. 100) and Declaration of Paul N. Tauger in Support of Motion for Summary Judgment/Summary Adjudication of Issues (Dkt. No. 99) in this matter. Tenza’s [Corrected] Motion for Summary Judgment/Summary Adjudication of Issues and [Corrected] Declaration of Paul N. Tauger in Support of Motion for Summary Judgment/Summary of Adjudication of Issues is being filed herewith.

The corrections, specifically, are as follows:

MOTION FOR SUMMARY JUDGMENT (DKT. NO. 100)

p. 3, line 10. Deleted at TENZA005707-09.

p. 3, line 17. Deleted at TENZA005707-09.

p. 4, line 6. Replace reference from Matthyssen Decl. ¶2 to Matthyssen Decl. ¶3

p. 4, line 11. Replace reference from Matthyssen Decl. ¶3 to Matthyssen Decl. ¶4

p. 4, line 14. Replace reference from Matthyssen Decl. ¶4 to Matthyssen Decl. ¶5

p. 5, line 18 Delete “and content”

p. 6, line 15. Replace reference from Matthyssen Decl. ¶5 to Matthyssen Decl. ¶6

p. 6, line 22. Replace reference from Matthyssen Decl. ¶4 to Matthyssen Decl. ¶7

p. 10, line 25. Replace reference from Matthyssen Decl. ¶4 to Matthyssen Decl. ¶5

p. 11, line 23. Replace reference to Exh. N (Marc Randazza deposition transcript) at 24:13-20 to at 23:13-20

p. 13, line 15. Replace reference to Exh. N (Marc Randazza deposition transcript) at 86:10-25 to at 85:10-25

P. 24, line 6. Replace reference to Exh. N (Marc Randazza deposition transcript) at 118:4-12 to at 117:4-12

p. 28, line 2 Add reference to Exh. B (Calista Response to Request for Admission) and Exh. Y (HTML Source Code of the Infringing Websites).

p. 31, line 24 Replace reference to Exh M, at Response to Interrogatory No. 11 to Exh M, at Response to Interrogatory No. 12

DECLARATION OF PAUL N. TAUGER IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT (DKT. NO. 99)

Exhibit J – excerpts of Tenza’s Response to Calista’s 1st Interrogatories. Exhibit has been corrected to include the signature page.

Exhibit M – excerpts of Calista’s Response to Tenza’s 1st Interrogatories. Exhibit has been corrected to include Interrogatory No. 12.

Exhibit N – Randazza deposition transcript. Exhibit has been corrected to replace pages 24, 86 and 118 with pages 23, 85 and 117.

Dated this 18th day of July, 2014.

Respectfully submitted,

s/ Devon Zastrow Newman

Paul N. Tauger, *appearing pro hac vice*
Anna M. Vradenburgh, *appearing pro hac vice*
THE ECLIPSE GROUP LLP
Telephone: 949-851-5000 ext. 110
Facsimile: 949-851-5051
Devon Zastrow Newman, OSB #014627
SCHWABE, WILLIAMSON & WYATT, P.C.
Telephone: 503-222-9981
Facsimile: 503-796-2900

Attorneys for Defendant Tenza Trading Ltd.